

1 **MICHAEL MEE, ESQ**

Nevada Bar No. 13726

2 **LIBERATORS CRIMINAL DEFENSE**

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4 Attorney for Defendant

5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 JAVIER GIOVANNI REYES RINCON,

11 Defendant.

Case No. 2:20-mj-000862-EJY

STIPULATION TO VACATE BENCH
TRIAL AND SET FOR ENTRY OF
PLEA AT A LATER DATE

12 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
13 Chiou, Acting United States Attorney, and Joshua Brister, Assistant United States
14 Attorney, counsel for the United States of America, Michael Mee, Esq., counsel for the
15 defendant, that the bench trial in the above-captioned matter, currently scheduled for June
16 22, 2022 at the hour of 9:00 a.m., be vacated, and the matter be re-set for an Entry of Plea
17 hearing for a period of approximately 60 days, to a date and time of the Court's
18 convenience.

19 This stipulation is entered into for the following reasons:

- 20 1. Defendant is out of custody and agrees to the continuance.
- 21 2. That undersigned counsel Michael Mee was retained on January 21, 2022, and
- 22 initially indicated that he expected to be able to proceed to trial in this case with
- 23 a ninety (90) day extension, which this Court then Ordered. That undersigned
- 24

counsel obtained a subsequent extension of time for the bench trial due to, in part, the fact that his daughter was in the hospital in intensive care.

3. That since then, the parties have entered into a plea agreement, signed by the Defendant, counsel for the Government, and counsel for the Defendant, and as such there will be no bench trial held in this matter.
4. That the parties intended to conduct the Entry of Plea on June 22, 2022, however, Mr. Mee's daughter is in the process of being transferred to a hospital in Philadelphia for specialized treatment and is scheduled for a surgical procedure on June 22, 2022.
5. That on this basis, Mr. Mee requested that the Trial date be vacated, and the matter be re-set for an Entry of Plea at a later date, to which counsel for the Government has graciously agreed to request by stipulation.
6. That therefore the parties stipulate and request that this Continuance be granted by the Court, that trial be vacated, and that the Entry of Plea hearing be scheduled for a later date approximately 60 days from now, to a date and time of the Court's convenience.

DATED this 20th day of June, 2022.

DATED this 20th day of June, 2022.

/s/ Michael Mee, Esq.
MICHAEL MEE, ESQ
Nevada Bar No. 13726
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/s/ Joshua Brister
JOSHUA BRISTER
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CHRISTOPHER CHIOU
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAVIER GIOVANNI REYES RINCON,

Defendant.

Case No. 2:20-mj-00862-EJY

**Order Vacating Bench Trial and Setting
Hearing for Entry of Plea**

Based on the pending stipulation of counsel, and good cause appearing therefore,

IT IS HEREBY ORDERED that the bench trial in the above-captioned matter currently scheduled for June 22, 2022, at the hour of 9:00 a.m. be vacated, and that this matter shall come before this Court for an Entry of Plea hearing on the date of July 27, 2022, at the hour of 9:00 a.m. in Courtroom 3D.

DATED this 21st day of June, 2022.


UNITED STATES MAGISTRATE JUDGE